

The Honorable John H. Chun

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SANJEEV KUMAR, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY, *et al.*,

Defendants.

CASE NO. 2:22-cv-1523-JHC

JOINT STIPULATION AND
ORDER TO EXTEND DEADLINE

NOTED FOR CONSIDERATION:
DECEMBER 20, 2022

The parties, by and through their counsel of record, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 10(g) and 16, hereby jointly stipulate and move to extend Defendants' time to respond to the Complaint until January 17, 2023. Plaintiffs are foreign nationals who bring this litigation pursuant to the Administrative Procedure Act and the Mandamus Act seeking, *inter alia*, to compel U.S. Citizenship and Immigration Services ("USCIS") to adjudicate their I-485 applications, as well as any derivative applications. Dkt. No. 1. Defendants have yet to answer the Complaint. Good cause exists to extend Defendants' time to respond to the Complaint until January 17, 2023.

1 A court may modify a deadline for good cause. Fed. R. Civ. P. 6(b). Continuing pretrial
2 and trial dates is within the discretion of the trial judge. *See King v. State of California*,
3 784 F.2d 910, 912 (9th Cir. 1986).

4 The parties are diligently working to resolve this litigation. USCIS has adjudicated ten of
5 the thirteen Plaintiffs' applications and taken initial adjudicatory action on at least one other.
6 USCIS anticipates that initial adjudicatory action on the remaining petitions will occur shortly
7 during the normal course of business. To give the parties time to discuss potential resolution of
8 this case, as well as allow USCIS additional time to continue with its adjudications, the parties
9 stipulate and jointly request that the Court extend Defendants' time to respond to the Complaint
10 until January 17, 2023.

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1 DATED this 20th day of December, 2022.

2 Respectfully submitted,

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21 *Attorneys for Plaintiffs*

ORDER

The Parties having so stipulated and agreed, the Court hereby ORDERS that Defendants' time to respond to the Complaint be extended until January 17, 2023.

Dated this 20th day of December, 2022.



JOHN H. CHUN
United States District Judge